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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SARAH ANDERSON,
FABIAN GOMEZ,
WENDY LABUDA,
WILLIAM OWEN,
JOALEEN ROGERS,

Defendants.

CASE NO. 2:22-CR-147-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 2, 2025
TIME: 10:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on June 2, 2025.
2. By this stipulation, defendants¹ now move to continue the status conference until **August 18, 2025, at 10:00 a.m.**, and to exclude time between June 2, 2025, and August 18, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

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¹ Defendant Epifanio Ramirez has requested, through counsel, that the Court set a change of plea hearing for him on June 2, 2025. He therefore does not join in this stipulation.

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced discovery in this matter, consisting of over 1,300 pages of investigative reports and photographs, including arrest reports, DEA reports, and other supporting documents. The government has also made available to the defense for viewing at the U.S. Attorney's Office, by appointment, hours of video surveillance evidence for multiple controlled drug buys in the underlying investigation.

b) Defense counsel desire additional time to conduct investigation into the charges, the alleged roles of their respective clients, and to review discovery in this case, including watching the video evidence the government has made available. Defense counsel will need additional time to discuss potential resolutions with their clients, prepare pretrial motions, and otherwise prepare for trial.

c) Counsel for defendants believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 2, 2025 to August 18, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 28, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney

Dated: May 28, 2025

/s/ DANIEL B. OLMOS
DANIEL B. OLMOS
Counsel for Defendant
SARAH ANDERSON

Dated: May 28, 2025

/s/ DAVID D. FISCHER
DAVID D. FISCHER
Counsel for Defendant
FABIAN GOMEZ

Dated: May 28, 2025

/s/ TASHA CHALFANT
TASHA CHALFANT
Counsel for Defendant
WENDY LABUDA

Dated: May 28, 2025

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
WILLIAM OWEN

Dated: May 28, 2025

/s/ TAMARA SOLOMAN
TAMARA SOLOMAN
Counsel for Defendant
JOALEEN ROGERS

ORDER

IT IS SO FOUND AND ORDERED.

Dated: May 28, 2025



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE